

## **ISO 14001:2004 - briefing note and transition requirements for IRCA EMS auditors**

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### **Scope:**

This document:

1. Outlines the broad implications of the 2004 revision for ISO 14001 for EMS auditors
2. Outlines the detailed changes made to the 2004 revision of ISO 14001
3. Explains the transition CPD requirements that you need to meet in order to maintain your IRCA EMS auditor certification

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- Brian Henry, IRCA EMS Reviewing Officer

## **1. Introduction – implications of ISO 14001:2004 for auditors**

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For many, the new standard might appear little different at first glance. Indeed, one of the objectives of the review was 'no new requirements' and ISO has issued a statement confirming that. However, careful reading indicates that there are numerous elements that need to be highlighted and understood by organizations and auditors, especially those elements that may directly affect the way ISO 14001 is implemented. You, as an EMS auditor, must be aware of them.

ISO 14001:2004 features clarifications of requirements and alignment with ISO 9001:2000 (particularly in terms of wording and titles) that make the standard more user-friendly. The changes are likely to require organizations to review and amend their system to ensure conformance with the final version. There are a number of key changes:

### **Environmental performance**

The main overall change, from the definitions to the requirements, is that ISO 14001:2004 is more focused on environmental performance, defined as "measurable results of an organization's management of its environmental aspects". If it was previously unacceptable for EMS auditors to evaluate documents while locked in a room, this revision makes it even clearer that auditors need to get down on the ground and assess the EMS in practice.

### **Alignment with ISO 9001**

Many EMS auditors will be familiar with ISO 9001:2000, however many are not and clauses which have been aligned to ISO 9001:2000 are completely new.

### **Evaluation of (legal) compliance – safeguarding ISO 14001's reputation**

Evaluation of legal compliance is another key difference. What was the last paragraph of Monitoring and Measurement is now a new clause with a new requirement to extend the evaluation of compliance to 'other requirements'.

Clearly it is the organization's responsibility to evaluate compliance and EMS auditors are not environmental legal inspectors. However, auditors must pay attention to how legal and other requirements are linked to environmental aspects, and how the organization implements its commitment to comply with legal and other requirements.

### **Fewer documented procedures**

One noticeable change has been that documented procedures are no longer required, except for procedures required under the clause relating to operational control. However, organizations still need to 'establish, implement and maintain' procedures to implement and manage their EMS.

### **Certification audit requirements not changed**

Auditors working with accredited certification bodies should also note that ISO 19011, ISO/IEC Guide 66:1999 and its IAF Guidance have not been changed, therefore requirements for audits remain the same.

## **2. Detailed summary of ISO 14001:2004 revisions**

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Below you will see the main changes by clauses and any specific implications for auditors.

### **Definitions**

Definitions were aligned with ISO 9000:2000, new definitions were introduced and a shift towards 'real' environmental performance can be seen in the very definition of 'environmental performance'.

- *auditor*: this definition is new and is taken from ISO 9000:2000 and links to the concept of competence of auditors which is detailed in ISO 19011:2002
- *continual improvement*: slight changes remind users that the process is recurring. The definition also is made more definitive by linking it to environmental performance rather than improvement of the management system
- *internal audit*: changes to the wording underline the fact that audits must be independent and switches the emphasis of the audit scope from determination of conformance of the EMS to determination of conformance with the EMS audit criteria
- *environmental performance*: the focus has changed from the management system to an organization's management of its environmental aspects
- *prevention of pollution*: the wording has been clarified to reflect methods and options for the prevention of pollution. More options are now listed

#### Scope - clause 4.1

This clause was often ignored by auditors because the requirements were too broad or vague. Now the requirements are clearer and one of them very specific: the scope shall be documented.

- the scope of the EMS must now be defined. This scope directly links the management system with the organization's activities, products and services
- it should be documented
- the organization needs to evaluate and document how its EMS fulfils the requirements of ISO 14001. This could be done as part of the internal audit or as part of management review, as long as it is traceable

#### Policy - clause 4.2

Several changes now require an organization to review its environmental policy. The policy should:

- be developed by top management
- cover the scope of the EMS and does not imply a wider scope than that
- cover all activity, products and services within the scope of the EMS

Note the change to terminology related to legislative and regulatory requirements reflects other requirements the organization may have subscribed to be distributed to everyone working for, or on behalf of, the organization, eg sub-contractors.

It is also important to note that the organization shall commit to comply not only with 'environmental' requirements, but with requirements related to environmental aspects. Some safety regulations for instance are clearly related to environmental aspects and shall be included.

#### Environmental aspects identification - clause 4.3.1

What would not be obvious for a few is now clear for all: activities, products **and** services must be covered: more attention must be paid to products, for instance. ISO 14001 auditors will **not** have to require a Life Cycle Analysis, but an understanding of the environmental aspects and impacts of what the organization can control or influence is fundamental.

- all activities, products and services within the scope of the EMS are covered. Control and influence are separated, and planned and new developments, new and modified activities, products and services are introduced
- significant aspects will now be considered in the planning activities such as new and changed activities, products and services as well as the development, implementation and maintenance of the EMS
- the wording regarding influence has changed from 'over which it can be expected to have an influence' to 'those which it can influence'. Thus, the procedure for identifying environmental aspects must cover all activities, products *and* services within the defined EMS scope

#### Legal and other requirements - clause 4.3.2

- 'legislative' has been changed to 'legal'. Thus, rather than referring to a law passed by government, 'legal' is much broader and covers regulatory and court decisions and others

**Resources, roles, responsibility and authority - clause 4.4.1**

- the replacement of the word 'provide' with 'ensure the availability' could be significant for organizations experiencing high staff turnover, particularly where this involves the loss of provided auditors. Organizations should have contingency plans in place to ensure that alternative auditors are available e.g. an auditor from an affiliated organization

**Competence, training and awareness - clause 4.4.2**

- a new term has come into use: 'persons working for, or on behalf of, the organization.' This is broader than just employees - or the old 'members' - and all relevant persons must be covered e.g. in terms of competence
- competence now extends in two directions: first, to 'potential significant impacts' and, second, to cover persons working for, or on behalf of, the organization
- competence evaluation should cover all persons working for, or on behalf of, themselves, such as subcontractors, contractors, temporary staff and remote workers, and that significant impact also covers potential impacts. The new first paragraph now allows organizations with established training needs to provide the training themselves or take other action e.g. recruiting

**Communication - clause 4.4.3**

- the changes clarify what organizations need to do if they decide to communicate externally about their environmental aspects. This will affect the management system only if it is decided to communicate in this way – in which case methods for communication need to be established

**EMS documentation - clause 4.4.4**

- the title has been changed to 'documentation' to reflect the fact that the requirements are now in common with ISO 9001:2000 and the list of required documents and records has been extended

**Document control - clause 4.4.5**

- the title and the wording have been changed in line with ISO 9001:2000, although the changes are minimal. The key ones relate to external documents and the need to identify changes to documents issued by the organization. This means document control procedures need to be reviewed and the wording updated.
- however, distribution control for documents of external origin - such as legal requirements - to which the organization subscribes must be identified
- note that documents don't need to be reviewed periodically anymore, 'only' when necessary
- changes in versions of documents issued by the organization must be identified by tracking changes, revision index etc.

**Emergency preparedness and response - clause 4.4.7**

- existing emergency and accident procedures should cover 'identification of potential emergency situations and potential accidents that can have (an) impact(s) on the environment, and how it (the organization) will respond to them'

#### **Evaluation of compliance - new clause 4.5.2**

- the last paragraph of clause 4.5.1 was brought into a separate clause to highlight the importance of periodic evaluation of legal compliance
- there an introduction of periodic evaluation of compliance with 'other requirements to which the organization subscribes'
- the rationale for the evaluation of legal compliance has been defined as being required 'to meet the organization's commitment to compliance...' Organizations will need to amend their procedure(s) for evaluation of legal compliance and also include or create another procedure for the compliance evaluation of other requirements to which the organization subscribes
- records of the evaluation should be kept to show its results and the fact that the periodic evaluation has been carried out

#### **Non conformance, corrective and preventive action - now clause 4.5.3**

- this section is now a very close match to the corresponding text in ISO 9001:2000 and the concept of potential nonconformity has been brought to the forefront

#### **Control of records – now clause 4.5.4**

- Alignment with ISO 9001:2000 introduces requirements for storage, protection, retrieval and retention of records

#### **Internal Audit – now 4.5.5**

- Selection of auditors and conduct of audits shall ensure objectivity and the impartiality of the audit process. Definition of Internal Audit (3.14): 'systematic, independent and documented process'
- Note that, 'Independence can be demonstrated by the freedom from responsibility for the activity being audited', this is particularly important for Small and Medium Size Enterprises (SMEs)

#### **Management Review (MR) – now 4.6**

- Alignment with ISO 9001:2000 implies in detailed list of input information plus 'environmental' inputs.
- New requirements to include a long list of issues in the MR: evaluation of compliance (4.5.2), communication with external parties, environmental performance, status of corrective and preventive actions, follow-up from previous MRs

There have been many comments and debates about the new ISO 14001 and despite press reports that predict 'business as usual', auditors must be aware that changes will be required to management systems in order to ensure effective audits against the new standard.



### 3. Transitioning your EMS Auditor Certification

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This revision to ISO 14001 is important and we will require you (IRCA certificated EMS auditors) to demonstrate that you have updated yourselves with the changes in the revision and that you understand the implications of these changes in the context of your EMS auditing activities.

#### Transition requirement for IRCA certificated EMS auditors

All IRCA certificated EMS auditors will need to complete **4 hours of continuing professional development** (CPD) focused on the changes in ISO 14001:2004 before completing any acceptable audits to the revised version ISO 14001:2004. This CPD and your completed audits will be reviewed during your normal tri-annual renewal of certification. You must include details of your relevant CPD in the CPD log that you submit as part of this process, and note which version of the standard each audit was conducted against in your audit log.

#### When does this start?

We will accept transition CPD and audits to the new standard from January 2005.

#### What kind of CPD will IRCA accept?

We do not require EMS auditors to complete a specific transition CPD, and you may achieve this in a number of ways as is consistent with usual IRCA approach to CPD:

- On the job training
- In-house training and seminars with your company
- Attendance at relevant conferences, seminars and workshops
- Reading (this briefing note and other relevant articles)
- A specific EMS auditor transition course

IRCA will provide a list of ISO 14001:2004 events and seminars that are acceptable for CPD: this will not be an exhaustive list and other CPD is acceptable. These events are offered by IRCA approved training organizations and OEAs, but are not formally certified by IRCA and, therefore, do not fall under IRCA control even though we accept them for CPD along with other training and events. See IRCA/232 for details of the recommended content for transitional training/events. You will find a list of such courses and events at our website, [www.irca.org](http://www.irca.org), as soon as they become available.

**If you have any questions, please contact us as [registration@irca.org](mailto:registration@irca.org).**

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